

**Illinois Commerce Commission****Pipeline Safety****Pipeline Safety Report****Inspection #: 2015-P-00392**

<b>Operator: AMEREN ILLINOIS COMPANY</b>	<b>Operator ID#: 32513</b>
<b>Exit Meeting Contact: Michael Fuller</b>	<b>Total Man Days: 6</b>
<b>Pipeline Safety Representative(s): Charles Gribbins, Bryan Pemble</b>	
<b>Company Representative to Receive Report: Michael Fuller</b>	<b><u>Emailed Date:</u></b>
<b>Company Representative's Email Address: mfuller2@ameren.com</b>	12/16/2015

**Inspection Summary**

<b>Inspection Type</b>	<b>Location</b>	<b>ICC Analyst</b>	<b>Inspection Unit(s)</b>	<b>Man Day(s)</b>	<b>Inspection Date(s)</b>	<b>Contact(s)</b>
Compliance Follow-Up	Pawnee	Charles Gribbins, Bryan Pemble	PAWNEE	6	10/27/2015, 10/28/2015, 10/29/2015	John Bozarth, Michael Fuller, Robert Roth

**Statement of Activities**

On October 27-29, 2015, Staff conducted a compliance follow-up at the Pawnee Training Center to address Issues, Notices of Amendments and Notices of Probable Violations, as well as the conversion of one Notice of Amendment to a Notice of Probable Violation.

Staff corrected the following: 14 Issues, 2 Notices of Amendments, and 2 Notices of Probable Violations. In closing the Notice of Amendment 2013-A001-00230, Staff changed this to a Notice of Probable Violation for failure to address the outstanding issues in NOA 2013-A001-00230. See the sections below for the Issues, Notice of Amendments, and Notice of Probable Violations that have been corrected. Also see the section below for the new Notice of Probable Violation that has been added.

**Exit Statement****INSPECTION FINDINGS****Compliance Follow-Up****Issues(s) Found:**

[NO ISSUES FOUND]

**Notice Of Amendment(s) Found:**

[NO NOAS FOUND]

**Notice Of Violation(s) Found:**

**2015-V001-00028** (Code Part [192.605(b) (3)]) - Staff is converting NOA 2013-A001-00230 to a NOPV. At this time, the operator failed to put the following statement in the Operations & Maintenance ("O&M") Plan to address CFR 192.605 (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. (3) Making construction records, maps, and operating history available to appropriate operating personnel. The following statement should have been placed into the Operator's O&M Manual, "Upon completion of gas projects, update to AIC's electronic Mapping System in G/Tech will be completed within 90 day period from the time the completed job packet is approved. During Staff's inspection on October 27-29, 2015, the operator has not included the above statement in to the O&M Manual, thus the NOA has been converted to

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a Notice of Probable Violation.

#### **PAST INSPECTION FINDINGS**

##### **Issue(s) Corrected:**

**2010-S001-00073** - Staff reviewed the following O&M procedures: PTST 1, Section 9 Test Records, B. The following statement will be added to the O&M Manual, "Pressure recording charts will be the official record and shall be retained in the final construction job packet." After review of the documentation provided by the operator, Staff closed this Issue.

**2010-S001-00074** - Staff reviewed the Operator's Operation and Maintenance Manual and noted that Ameren added language to the Operator Qualification (OQAL 1) section of the O&M manual which addresses the re-evaluation timeframe. Section 6 subsection J states "Re-Evaluation Intervals (1) Ameren Illinois has elected to adopt the ASME B31Q Standard for re-evaluation intervals as referenced in Appendix 5A in the ASME B31Q Standard. (2) Subsequent re-evaluations of an individual's qualification to perform covered tasks may not exceed the re-evaluation intervals listed in the Covered Task List plus an additional grace period of three months." With this information added to the O&M Manual, Staff closed this Issue.

**2010-S001-00075** - Staff reviewed the Operator's Operation and Maintenance Manual and noted that Ameren has added language to the Leak Management (LEAK) section of the O&M manual to address the issue of classifying below grade leaks. Section 2.04 subsection 2 D states "Below grade gas leaks must be graded using a CGI that has been calibrated and tested according to manufacturer's operating instructions." With this review, Staff closed this Issue.

**2010-S001-00082** - Staff reviewed documents provided by Ameren which indicated that Ameren replaced the service at 2517 Shelby with polyethylene and installed two galvanic anodes on the gas main. The retirement of the gas service to 2517 Shelby and the addition of the anodes brought the cathodic protection level of the CP Structure above the -.850 minimum level. Ameren re-read the locations where Staff discovered the low reads and all were found at a protected level: 2504 Shelby Ave CP -1.216; 2512 Shelby Ave CP -1.238; 913 Dewitt Ave CP -1.423; 1500 Rudy Ave CP -1.463. The cathodic protection readings were taken on December 28, 2011, by Dirk Wilson, Ameren CP Tech. With the review of documents provided by the Operator, this Issue can be closed.

**2010-S001-00085** - Ameren stated in the Damage Prevention Program that it is their intent to prevent damage to their pipeline during excavation. 6. Inspection of Construction or Excavation Activities. "A. Inspection of any excavation near pipeline facilities may be necessary during excavation or construction activities performed by any excavator or contractor when Ameren Illinois has reason to believe the activity could damage pipeline facilities. B. The inspection must be done as frequently as necessary, during and after the excavation or construction, to ensure the facilities are protected and to detect and repair any damage. C. In the case of blasting activity within one hundred (100) feet of a gas facility, the inspection must include leakage survey." After the review of the documentation provided by the operator, Staff can close this Issue.

**2010-S001-00086** - Staff reviewed the Operator's Operations and Maintenance Manual and noted that the leak survey process has been updated from a paper driven process to an electronic map format that will incorporate a routing feature to ensure the leak survey includes all the assets associated with the survey id number. This will alleviate the issue of the paper maps provided to the leak survey technician not matching or agreeing with the electronic records. Refer to NOPV 2014-001-00031 for additional information. Staff can close this Issue

**2010-S001-00088** - Staff reviewed the Operator's Operation and Maintenance Manual and noted that on January 1, 2013, Ameren added the following language to their O&M manual. Pressure Testing (PTST) 2.01 Section 4 subsection E states " If pressure test is being recorded by a chart recorder, the inspector or person responsible for the test should document, on the

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chart, the reason for any pressure fluctuation, such as temperature, vibration, vandalism, leak, etc., once the test duration has begun. Documentation can be attached to the chart if needed." The added language will require the individual performing the pressure test to identify and explain pressure fluctuations during testing procedures. With this review, Staff can close this Issue.

**2010-S001-00152** - Staff reviewed this Issue which indicated that Ameren requires a high stress or maintenance welder to complete a 6 on 6 branch weld during the annual qualification. Staff reviewed the following Ameren Illinois Welding Procedure 2.02 standard to ensure it addressed this issue: D. Pipeline/Fabrication Multiple – Qualification; A (3) The second test will be a "branch on" fillet weld test in the horizontal fixed position. (a) This test will also use > 12.75" pipe with a wall thickness > 0.250. (b) The welder shall layout, cut, fit and weld a full sized branch-on-pipe connection. (c) A full size hole shall be cut in the run pipe. This section was added to the O&M Manual on January 1, 2012. After review of the O&M Manual and this procedure, Staff can close this Issue.

**2010-S001-00153** - The issue indicated that the welders were not following company procedures as far as laying out, cut, fit and weld the test specimen to establish the welder's ability to perform these tasks. Staff reviewed the following section of the operator's O&M Manual: 5. Qualification Categories (Initial Test); D Pipeline/Fabrication Multiple – Qualification; 3) The second test will be a "branch on" fillet weld test in the horizontal fixed position; (b) The welder shall layout, cut, fit and weld a full sized branch-on-pipe connection. This procedure was added to the O&M Manual January 1, 2012. Now that these tasks have been added to the O&M Manual, Staff can close this Issue.

**2010-S001-00154** - Staff requests that Ameren establish a procedure to be used to ensure that the weld test specimens being submitted by the welder are performed as required. Staff reviewed the following section of the operator's O&M Manual and noted that the following was added to the O&M: 4. Welding Inspector; A. Welder qualification shall be conducted under the supervision of an Ameren Illinois approved welding inspector/observer; 8. Welder Re-Qualification; A. Active welders must re-qualify every 6 months, not to exceed 7 ½ months; B. Welders that have not welded in their qualified process within 6 months shall be deemed inactive and forfeit the 6 week grace period. (1) No welder whose qualification is based on nondestructive testing may weld compressor station pipe and components. (2) The six month requalification test may be taken from a production weld however if this is not possible the following welds shall be made for the specified process. (3) The following series of sample test welds will be completed by the welder while in the presence of a qualified observer. The welds will be tested by a qualified welding inspector for compliance with acceptance criteria as set forth by API 1104. After review of the O&M Manual procedures, Staff can close this Issue.

**2010-S001-00155** - Staff requests Ameren to establish a procedure defining a documentation process to be utilized to record the training or practice time completed by this individual prior to initiating their requalification testing. Staff reviewed the welding procedures to verify that the operator has procedures in place to document training or practice time completed by the individual prior to initiating their requalification testing, See the following section. WELD 2.02; 9. Destructive Testing; A. Requalification of Welder – If a qualified welding inspector / instructor is present at the time of the welder's failure and the cause of the failure can be determined; (1) Following on the spot training and procedure review the welder will be given one more opportunity to submit at least two additional sample tests and if both tests are successful there will be no need to perform a full test. (2) A welder that fails a requalification test may qualify at a later date by participating in additional training and procedure review and producing a full initial test under the supervision of a qualified welding inspector as outlined in this manual for appropriate initial qualification. (3) After a period of no less than 5 days, the employee will be re-evaluated, using the same evaluation methods used for the initial qualification. This will ensure that the employee is not being tested on their short-term memory. After a review of the O&M Manual procedures, Staff can close this Issue.

**2010-S001-00157** - Staff reviewed Welding procedures and noted that the Operator added the following procedures for the Training Supervisor: 4. Welding Inspector; A. Welder qualification shall be conducted under the supervision of an Ameren Illinois approved welding inspector/observer; B. An independent testing agency may be used to provide "Destructive testing" and document the qualification testing of welders; C. The Training Supervisor – Welding shall assure that all welding is conducted in

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accordance with the approved welding procedures (WPS), standards and codes; D. This individual shall have been trained in the use of Ameren Illinois Gas Operating and Maintenance Plan, applicable codes/standards and shall have previous experience in welder testing programs; E. The Training Supervisor – Welding shall be responsible for assuring all welder qualification records are processed and distributed in accordance with the Company Operation and Maintenance Plan. With the addition of these procedures, Staff can close this Issue.

**2011-S001-00082** (Code Part [192.465]) - Staff reviewed the documentation provided by Ameren. Ameren replaced the service at 2517 Shelby with polyethylene and installed two galvanic anodes on the gas main. The retirement of the gas service to 2517 Shelby and the addition of the anodes brought the cathodic protection level of the CP Structure above the -.850 minimum level. Ameren re-read the locations where Staff discovered the low reads and all were found at a protected level: 2504 Shelby Ave CP - 1.216; 2512 Shelby Ave CP -1.238; 913 Dewitt Ave CP -1.423; 1500 Rudy Ave CP -1.463. The cathodic protection readings were taken on December 28, 2011, by Dirk Wilson, Ameren CP Tech. Staff reviewed the documents provided by the operator and with this completed review, Staff can close this Issue.

**2012-S001-00037** (Code Part [192.615(b) (2)]) - Staff reviewed the Ameren Emergency Plan training records for 2011; however, Ameren was unable to provide the written documentation which captured the signatures of the Emergency Plan Training attendees. To prevent any future instances, Ameren indicated the signature documentation is now retained in the Ameren Insight LMS database. Ameren has provided Staff with an electronic copy of the 2012 through 2014 signature documentation for confirmation that personnel in the Quincy operating center received the Emergency Plan Training. After completing the review of records and procedures, Staff can close this Issue.

#### **Notice Of Amendment(s) Corrected:**

**2013-A001-00230** (Code Part [192.605(b) (3)]) - Staff will be closing NOA-2013-A001-00230 and converting it to a NOPV due to the fact that the operator has not added the following language to the Operations and Maintenance Manual as required by the NOA: "Upon Completion of gas projects, updates to AIC's electronic mapping system in G/Tech will be completed within a 90 day average period from the time the completed job packet is approved."

**2014-A001-00117** (Code Part [192.281]) - Staff reviewed the Operations & Maintenance procedures to ensure that a definitive statement was added about when, and how an electrofusion box will be calibrated. The following statement will be added to the O&M Manual by January 2016: "Electrofusion processors shall be calibrated at intervals that at least meet the requirements contained in Manufacturer's Instructions. See POLY 4. There will be a compliance period of the manufacturer's recommended interval plus ninety (90) days." With the addition of this statement, Staff can close this NOA.

#### **Notice of Violations(s) Corrected:**

**2014-V001-00030** (Code Part [192.603(b)][192.723(b)(1)]) - Staff reviewed the following documentation to confirm that the missed 2 inch section of steel main on Bissell Avenue was inspected and was included on the map to be used on the next leak survey cycle. Staff reviewed leak survey sheets and the following leak surveys were conducted: April 30, 2014, then again on November 3, 2014, The next leak survey was conducted starting on August 31, 2015, and finished on September 3, 2015. After completing the review of documentation provided by Ameren Illinois, Staff closed this NOPV.

**2014-V001-00031** (Code Part [192.491(c)][192.465(e)]) - Staff reviewed documentation relating to NOPV 2014-V001-00031. During the review, Staff noted 13 of the original 24 cathodically unprotected steel pipelines had been removed from the active unprotected leak survey list. The operator explained that gas lines in these 13 locations had been replaced and were therefore removed from the cathodically unprotected leak survey list. The remaining 11 sections are correctly coded as cathodically unprotected steel lines in Ameren Illinois Company Gas Compliance System and will be surveyed as required in Ameren's O&M

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manual. After review of the documentation provided by the operator, Staff can close this NOPV.